

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

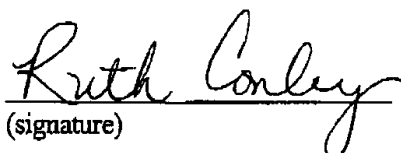
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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: 11-24-03


(signature)

Ruth Conley
(printed name)

Controller
(Title)

Company Name: Foothills Rural Telephone Cooperative Corp., Inc.

Company Address: P.O. Box 240

Staffordsville, KY 41256

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Date: Nov 24, 2003

Jimmy L. Torrey
(signature)

Jimmy L. Torrey
(printed name)

Revenue Manager
(Title)

Company Name: Franklin Telephone Co., Inc.

Company Address: P.O. Box 219

Meadville, MS 39653

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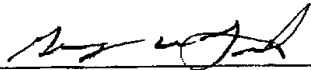
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Date: November 24, 2003


(signature)

George W. Fish
(printed name)

General Manager
(Title)

Company Name: Garden Valley Telephone Company

Company Address: 201 Ross Avenue

PO Box 259

Erskine, MN 56535

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Date: 11/24/03

Janice E. O'Brien
(signature)

Janice E. O'Brien
(printed name)

President
(Title)

Company Name: Glenwood Telephone Company

Company Address: P. O. Box 235
202 W Fourth Ave
Glenwood, GA 30428-0235

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Date: 11-24-03

Kenneth P. Roberts
(signature)

KENNETH P. ROBERTS
(printed name)

CONTROLLER
(Title)

Company Name: GRAND RIVER MUTUAL TELEPHONE CORP.

Company Address: 1001 KENTUCKY ST.
PRINCETON, MO 64673

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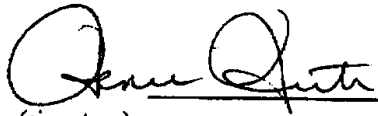
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Date: 11/24/2003


(signature)

Renee' Reeter
(printed name)

Controller
(Title)

Company Name: Green Hills Telephone Corporation

Company Address: 7926 NE State Route M
Breckenrdge, MO 64625

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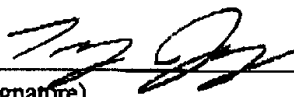
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Date: 11-25-03


(signature)

Trey Judy
(printed name)

Director-Regulatory
(Title)

Company Name: Gulf Telephone Company - Alabama

Company Address: % P.O. Box 430
Mebane N.C. 27302

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Date: 11/25/03

Bethany J. Millar
(signature)

Bethany J. Millar
(printed name)

General Manager
(Title)

Company Name: Hancock Telephone Company

Company Address: 34 Read Street

PO Box 608

Hancock, NY 13783

**DECLARATION OF PETITIONING
INCUMBENT RURAL TELEPHONE COMPANY**

The undersigned company is a rural telephone company that received a memorandum dated August 29, 2003 together with an attached invoice from APOC Services, Inc. on behalf of various Payphone Service Providers ("PSPs") that referenced the Federal Communications Commission decision from October, 2002 addressing compensation obligations to PSPs.

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Date: 11/24/2003 _____
(signature)

Tim Hills

(printed name)

President

(Title)

Company Name: Hancock Rural Telephone Corp d/b/a Hancock Telecom

Company Address: P.O. Box 108

Maxwell, IN 46154

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Date: 11-25-03

Kenneth Doughty
(signature)

Kenneth Doughty
(printed name)

Pres.
(Title)

Company Name: Hinton Telephone Co., Inc.

Company Address: Box 1040

Hinton, OK 73047

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: Nov. 24, 2003

Steven H. Stogren
(signature)

STEVEN H. STOGREN
(printed name)

PRESIDENT
(Title)

Company Name: Loretel Systems Inc. CN 1443

Company Address: 13 East Fourth Ave.
PO Box 72
Ada, MN 56510

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Date:

11/24/03
(signature)Douglas Hinkley
(printed name)Gen Mgr
(Title)

Company Name:

Margaretville Telephone Co. Inc

Company Address:

Box 260
Margaretville NY 12455

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

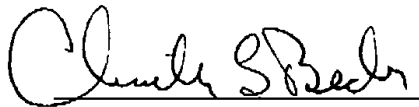
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Date: 11/21/03


(signature)

Christopher L. Becker
(printed name)

Vice President
(Title)

Company Name: The Middleburgh Telephone Co

Company Address: 103 Cliff St
PO Box 191
Middleburgh NY 12122-0191

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Date: Nov 21, 2003


(signature)

DAVID ESPINOZA
(printed name)

CONTROLLER
(Title)

Company Name: MILLINGTON TELEPHONE CO, INC

Company Address: 4380 NAVY RD

MILLINGTON, TN 38053

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Date: NOVEMBER 24, 2003


(signature)

RICHARD J. THRONSON
(printed name)

GENERAL MANAGER
(Title)

Company Name: MISSOURI VALLEY COMMUNICATIONS, INC.

Company Address: PO BOX 600, HWY 13 S

SCOBEE, MT 59263

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

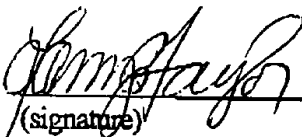
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Date: 11/24/03


(signature)

Larry P. Taylor
(printed name)

President
(Title)

Company Name: Moundville Telephone Company, Inc.

Company Address: P.O. Box 587 Moundville, AL 35474-0587

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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: NOVEMBER 24, 2003


(signature)

RICHARD J. THRONSON

(printed name)

GENERAL MANAGER

(Title)

Company Name: NEMONT TELEPHONE COOPERATIVE, INC.

Company Address: PO BOX 600, HWY 13 S

SCOBAY, MT 59263

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

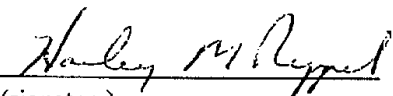
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Date: 11-24-03


(signature)

Harley M. Ruppert
(printed name)

President
(Title)

Company Name: Newport Telephone Co., Inc.

Company Address: P.O. Box 201

3077 Bridge Street

Newport, N.Y. 13416

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY


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Date: 11/25/03


(signature)

Chris Hopp
(printed name)

Controller
(Title)

Company Name: New Ulm Telecom, Inc.

Company Address: 27 North Minnesota St.,

P.O. Box 697

New Ulm, MN 56073-0697

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

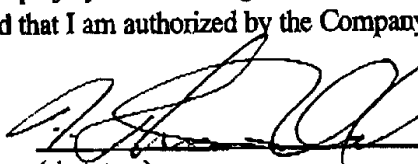
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Date: 11/24/03


(signature)

F. Thomas Rowland
(printed name)

President + CEO
(Title)

Company Name: North Central Telephone Coop. Inc.

Company Address: 872 E. Hwy. 52 Bypass
P.O. Box 70
Lafayette, TN 37083

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

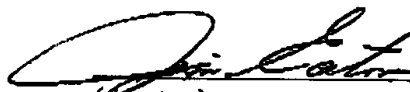
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Date: November 21, 2003


(signature)

Jim Eaton
(printed name)

Assistant Manager
(Title)

Company Name: Pioneer Telephone Cooperative, Inc.

Company Address: P.O. Box 539
Kingfisher, OK 73750

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

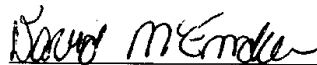
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Date: Nov. 21, 2003



(signature)

David McEndree

(printed name)

CEO

(Title)

Company Name: Poka Lambro Telephone Cooperative, Inc.

Company Address: PO Box 1340

Tahoka, Texas 79373-1340

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 11/25/2003

Catherine M. Mess
(signature)

Catherine M. Mess
(printed name)

President
(Title)

Company Name:

Price County Telephone Company

Company Address:

105 N Avon Avenue

PO Box 108

Phillips WI 54555

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: NOVEMBER 24, 2003


(signature)

RICHARD J. THRONSON

(printed name)

GENERAL MANAGER

(Title)

Company Name: PROJECT TELEPHONE COMPANY

Company Address: PO BOX 600, HWY 13 S

SCOBAY, MT 59263

**DECLARATION OF PETITIONING
INCUMBENT RURAL TELEPHONE COMPANY**

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Date:

11/25/03
(Signature)STEVE SCHART

(printed name)

VP FINANCIAL & INFO TECHNOLOGIES
(Title)

Company Name:

Ringgold Telephone Co.

Company Address:

7449 Nashville ST.Ringgold, GA 30734

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

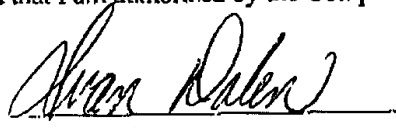
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Date: 11/24/03


(signature)

IVAN DALEN
(printed name)

GENERAL MANAGER
(Title)

Company Name: BUTTVEN TELEPHONE EXCHANGE CO.

Company Address: 1607 BOLLING ST.

P.O. BOX 70

BUTTVEN, IA 51358

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 11-24-03

G. Ray Lawrence
(signature)

G. Ray Lawrence
(printed name)

OPERATION MGR.
(Title)

Company Name: SEI COMMUNICATIONS

Company Address: 14005 U.S. HIGHWAY 50E.
DILLSBORO IN 47018

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Date: 11-22-03

Lisa Patton
(signature)

Lisa Patton
(printed name)

Vice President
(Title)

Company Name: Shidler Telephone Company

Company Address: PO Box 25
Shidler, OK 74652

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

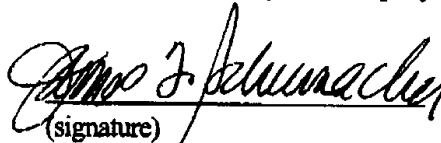
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Date: 11/26/03


(signature)

James T. Schumacher

(printed name)

Vice President - Finance

(Title)

Company Name: Smart City Telecommunications LLC d/b/a Smart City Telecom

Company Address: 3100 Bonnet Creek Road

PO BOX 22555

Lake Buena Vista, FL 32830-2555

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Date: 11/24/03


(signature)

CHRIS LAWRENCE
(printed name)

Business Director
(Title)

Company Name: South Central Rural Telephone Cooperative Corp., Inc.

Company Address: P.O. Box 159
Glasgow, KY 42142-0159

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 11/24/03

Don Lawrence
(signature)

DON LAWRENCE
(printed name)

PRESIDENT
(Title)

Company Name: STAYTON COOPERATIVE TELEPHONE CO.

Company Address: P.O. Box 477
STAYTON, OR 97383

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 11/21/03

Lera Roark
(signature)

Lera Roark
(printed name)

V.P.
(Title)

Company Name:

TEC Companies (6 Tekas)

Company Address:

1309 Louisville Ave
Memphis, TN 38101

Bay Springs
Telephone Co.

National Tel. of Ala.
Roanoke Telephone
Crockett Telephone

Peoples Telephone

(West Tennessee Telephone) West Tenn. Telephone

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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When dial around calls and subscriber toll-free calls are made from payphones located in the Company's service area, we automatically route those calls from our central office to the toll provider (the Regional Bell Operating Company or other Interexchange Carrier) assigned the access code or the 8XX number being dialed. This automatic routing is triggered by the end user dialing a "1" and occurs even where the call is ultimately terminated to an end user located within our service area. Once routed to the toll provider, however, the toll provider controls the routing of the call and how that call will be terminated. Unlike the regional Bell Operating Company, our company is not an intraLATA toll provider.

Accordingly, when calls are made from any pay station in our service area, it is not possible for our company to handle a call that is compensable. Unlike the regional Bell Operating Companies or other local exchange carriers that provide intraLATA services on a compensable basis, our company provides only originating access service to other carriers. With respect to the traffic associated with the invoice received from APCC, we conclude that the compensable calls were handled by the intraLATA toll provider that is assigned to the paystation; no compensable calls were handled by our company.

I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: November 21, 2003



(signature)

Charles W. Wiese

(printed name)

General Manager

(Title)

Company Name: Tohono O'odham Utility Authority

Company Address: PO Box 816

Sells, Arizona 85634

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Date: 11/21/03


(signature)

WILLIAM R. TATUM

(printed name)

President

(Title)

Company Name: Trenton Telephone Co.

Company Address: PO Box 216

Trenton, GA 30752

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Date: 11/20/03



(signature)

Richard Stevens

(printed name)

General Manager

(Title)

Company Name: Triangle Telephone Cooperative Assn., Inc.

Company Address: P. O. Box 1220

Havre, MT 59501-1220

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Date: NOVEMBER 24, 2003


(signature)

RICHARD J. THRONSON
(printed name)

GENERAL MANAGER
(Title)

Company Name: VALLEY TELECOMMUNICATIONS, INC.

Company Address: PO BOX 600, HWY 13 S

SCOBAY, MT 59263

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Date: 11-20-03

Virgil Barnard
(signature)

VIRGIL BARNARD
(printed name)

CONTRACTS & COMPLIANCE MANAGER
(Title)

Company Name: VALLEY TELEPHONE COOPERATIVE, INC.

Company Address: P.O. Box 970
Willcox, AZ 85644

DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

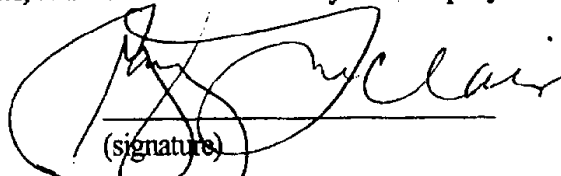
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Date: November 24, 2003


(signature)
Gary McClain

(printed name)

Marketing Public Relations Mgr.

(Title)

Company Name: West Kentucky Rural Telephone

Company Address: 237 North 8th Street
Mayfield, KY 42066

TO: Tom moorman

DEPT: _____

CO: KLC-Attorneys

FAX: 2022968893

HP FAX
FROM: Way
DATE: 11-24-03

CERTIFICATE OF SERVICE

I, Kellie Breedlove, of Kraskin, Lesse & Cosson, LLC, 2120 L Street, NW, Suite 520, Washington, DC 20037, do hereby certify that a copy of the foregoing "Petition for Clarification or, in the Alternative, Waiver" was served on this 26th day of November 2003, to the following parties:


Kellie Breedlove

William Maher, Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
(Hand Delivered)

Qualex International
445 12th Street, SW
Room CY-B402
Washington, DC 20554
(Hand Delivered)

Robert F. Aldrich
Dickstein Shapiro Morin & Oshinsky, LLP
2101 L Street, N.W.
Washington, D.C. 20037-1526